

**Oral Argument Not Yet Scheduled
No. 25-5152**

**In the United States Court of Appeals
for the District of Columbia**

COALITION FOR HUMANE IMMIGRANT RIGHTS, *et al.*,
Plaintiffs - Appellants,

v.

UNITED STATES DEPARTMENT OF HOMELAND SECURITY, *et al.*,
Defendants – Appellees,

On Appeal from the United States District Court for the District of Columbia
Case No. 1:25-cv-00943-TNM, Honorable Trevor N. McFadden, District Judge

**UNOPPOSED MOTION OF IMMIGRATION REFORM LAW INSTITUTE
TO FILE A BRIEF AS *AMICUS CURIAE* IN OPPOSITION TO
PLAINTIFFS' MOTION FOR STAY**

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On the Brief

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DISCLOSURE STATEMENT

Pursuant to Fed. R. App. P. 26.1 and Circuit Rule 26.1, *amicus curiae*

Immigration Reform Law Institute makes the following disclosures:

- 1) For non-governmental corporate parties please list all parent corporations: None.
- 2) For non-governmental corporate parties please list all publicly held companies that hold 10% or more of the party's stock: None.
- 3) The following entity has an interest in the outcome of this case:
Immigration Reform Law Institute.

Movant Immigration Reform Law Institute (“IRLI”) respectfully seeks this Court’s leave to file the accompanying *amicus curiae* brief in support of Defendants-Appellees and in opposition to Plaintiffs-Appellants motion for stay pending appeal. Counsel for *amicus* IRLI has conferred with counsel for all parties, and no party opposes the request for leave. In furtherance of this motion, *amicus* IRLI states as follows:

1. IRLI is a nonprofit 501(c)(3) public interest law firm dedicated both to litigating immigration-related cases in the interests of United States citizens and to assisting courts in understanding federal immigration law. IRLI has litigated or filed *amicus curiae* briefs in a wide variety of immigration-related cases. For more than twenty years the Board of Immigration Appeals has solicited supplementary briefing, drafted by IRLI staff, from the Federation for American Immigration Reform, of which IRLI is a supporting organization. For these reasons, IRLI has direct interests in the issues here.

2. The proffered *amicus* brief discusses the purpose and history of alien registration, its significance to the public interest, and how the Interim Final Rule (“IFR”) furthers this public interest by streamlining the registration process and allowing DHS to better achieve its congressionally mandated objectives. Furthermore, the brief demonstrates why the balance of equities weighs in favor of the IFR being upheld and against injunctive relief.

3. Because these issues are relevant to this Court's decision on Plaintiffs-Appellants' motion for injunctive relief pending appeal, IRLI's brief may aid the Court.

For the foregoing reasons, IRLI respectfully requests that the Court grant its motion for leave to file the accompanying brief as *amicus curiae*.

Dated: May 27, 2025

Respectfully submitted,

/s/ Christopher J. Hajec
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CERTIFICATE OF COMPLIANCE

The foregoing motion complies with Fed. R. App. P. 27(d)(2)(A) because it contains 265 words, as measured by Microsoft Word software. The motion also complies with the typeface and style requirements of Fed. R. App. P. 32(a)(5) & 32(a)(6) because it has been prepared in a proportionally spaced, Roman-style typeface of 14 points or more.

Dated: May 27, 2025

Respectfully submitted,

s/ Christopher Hajec

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of May 2025, I electronically filed the foregoing motion—together with its accompanying *amicus* brief—with the Clerk of the Court using the CM/ECF system, which I understand to have caused service of the parties' counsel.

s/ Christopher Hajec